

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**THOMAS C. GOLDSTEIN,**

**Defendant.**

**CRIMINAL NO. LKG-25-0006**

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**GOVERNMENT’S RESPONSE TO DEFENDANT’S NOTICE  
REGARDING CERTAIN PRETRIAL MOTIONS**

On September 11, 2025, Goldstein filed a document, styled “Notice Concerning [Defendant’s] Motion to Dismiss Allegations Concerning Employees (ECF No. 122) and His Motion for Bill of Particulars (ECF No. 125),” which misstates or misrepresents the government’s position.

Goldstein’s notice cites a single sentence from a July 14, 2025 email from the government; suggests, based on that one sentence, that the government changed or “clarified” its position regarding the deductibility of payments to four of Goldstein’s mistresses (or prospective mistresses); and then purports to “withdraw[] th[e] portion of [his] motion of bill of particulars that requests the ‘specific amount of the four employees’ salaries and insurance premiums that the government alleges were improperly deducted as business expenses.”” ECF No. 171 at 2-3. Goldstein’s counsel did not ask the government for its position on his notice before filing it.

Notwithstanding that filing, the government has not changed its position on the Superseding Indictment’s allegations about Goldstein’s four mistresses (or prospective mistresses), as detailed in the government’s oppositions (ECF Nos. 134 & 135) to the relevant pending motions. Those two motions are fully briefed and should be resolved at the October 24, 2025 hearing. If

Goldstein is withdrawing portions of his motion for bill of particulars (ECF No. 125), that is his choice. However, a single sentence plucked from a single email (attached here as Exhibit 1) did not change or abrogate the government's position or the grand jury's allegations in the Superseding Indictment.

Respectfully submitted,

Kelly O. Hayes  
United States Attorney

/s/ Hayter L. Whitman  
Hayter L. Whitman  
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Department of Justice—Tax Division

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**CERTIFICATE OF SERVICE**

I hereby certify that on September 26, 2025, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Hayter L. Whitman  
Hayter L. Whitman  
Trial Attorney  
Department of Justice—Tax Division